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Ms. Sharon Wiley, Deputy Clerk
United States Court of Appeals
for the Fourth Circuit
501 United States Court House Annex
1100 East Main Street
Richmond, VA 23219-3517

RE: *United States v. Paulette Martin, et al.*
4th Circuit No. 07-4059 (L)
Supplement to motion to stay

Dear Ms. Wiley:

I submit this letter in my role as lead counsel as a supplement to the motion to stay the appeal, and a status report concerning the progress of the forfeiture matters before the district court, which matters were the subject of the motion to stay.

The government (Appellee) has filed this date a consent request for an extension of time until May 20 to file a response in the district court. I therefore submit that a hearing likely will not be held until June, and a ruling will not issue until then, or shortly thereafter.

Notwithstanding this, however, the various counsel for Appellants are finishing their work on assembling the JA, in order that Appellee might in turn be able to identify what it wishes to add to this. Counsel for Appellants are submitting issues (presently numbering at least 16) and related materials to me for inclusion in the joint brief. In addition, I am crafting the general argument on the forfeiture issue, in anticipation of quickly finalizing same once the district court has ruled and this issue is ripe for resolution as being properly before this Court.

Accordingly, I submit that by the point the forfeiture issue is resolved by the district court, the balance of the joint brief and JA will be substantially prepared, and we will be able to submit our initial filing to the Court within the time set out in the new briefing order which will then issue, in order that this appeal will not be delayed further.

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Thank you for your attention to this. Please do not hesitate to contact me should you have any further questions.

Very truly yours,

/s/

Michael D. Montemarano

MDM/ap

cc: all listed counsel for Appellee and Appellants, via email